

Nikon Group Slavery and Human Trafficking Statement for the fiscal year ended March 2025

This statement is made in accordance with the United Kingdom Modern Slavery Act of 2015 to explain actions we have taken during the fiscal year ending March 31, 2025 (“FY2024”). The Nikon Group, Nikon Corporation and its consolidated subsidiaries (“Nikon”, or “we”), endeavours to ensure that there are no human rights violations through our own business operations or our supply chains. We hereby provide this disclosure statement regarding our activities to prevent and tackle modern slavery and human trafficking.

a. Overview of the company, business and supply chain

Nikon has been engaged in various business fields, such as Imaging Products (digital cameras and interchangeable lenses), Precision Equipment (FPD lithography systems and Semiconductor lithography systems), Healthcare (microscopes and retinal diagnostic imaging systems), Components (optical components, EUV related components, etc.), Industry Metrology, and Digital manufacturing (industrial machinery and optical processing machines), based on the opto-electronic and precision technologies that Nikon has developed since its establishment in 1917. Nikon manufactures and sells such equipment and apparatuses. Also, Nikon delivers integrated solutions encompassing end products, services and components. Details of our company and business information can be found on the “Corporate Information” page of the Nikon Corporation’s website.

<https://www.nikon.com/company/corporate/>

Nikon’s product parts and a small portion of the final products are supplied from external procurement partners, in and outside of Japan. More than 90% (calculated by the transaction amount in the country in which they are located) of procurement partners are based in Japan, China and Southeast Asia. Details can be found on the “Sustainability Report (Materiality 6: Building a Resilient Supply Chain)” page of the Nikon Corporation’s website.

<https://www.nikon.com/about/sustainability/report/>

b. Policies related to modern slavery and human trafficking

Nikon Code of Conduct/ Nikon Human Rights Policy

Nikon has the “Nikon Code of Conduct” (“Code”) in place where we set out our stance on social responsibility and the standard of conduct for individuals who work for Nikon.

(See <https://www.nikon.com/about/sustainability/nikon-sustainability/codeofconduct/>).

The Code includes the sections of “Respect for Human Rights” and “Social Responsibility in the Supply Chain”, where we clarify our stance against forced labour and child labour not only with respect to Nikon, but also our suppliers and business partners.

Since April 2019, we have our “Nikon Human Rights Policy” (“Policy”)

(https://www.nikon.com/about/sustainability/society-labor/human-rights/human_rights_policy.pdf) in place in order to provide further detail on our approach to addressing human rights issues related to our business activities, based on the Code.

Nikon has revised its Human Rights Policy on April 1, 2025 in order to respond to societal demands and changes in its business operations and to further promote efforts to respect human rights. In making the revision, a human rights impact assessment was conducted to identify important human rights issues that should be addressed, taking into account the current business environment surrounding Nikon.

In this assessment, we interviewed people within the company to understand the rights holders in Nikon’s value chain and prioritized them in terms of the importance of human rights issues to Nikon and their relevance to our business. As a result, we identified six important human rights issues: “health and safety”, “working environments”, “workers’ human rights in the supply chain”, “zero tolerance for child labor and forced labor”, “ethical use of AI”, and “access to remedy”.

These salient human rights issues are clearly stated in our human rights policy, and we are committed to

addressing them in a planned manner and to seeking continuous improvement through dialogue with stakeholders.

Responsible Business Alliance (RBA) Code of Conduct

Furthermore, Nikon is a member of the RBA, the world's largest industry coalition dedicated to responsible business conduct in global supply chain. Nikon strives to comply with the RBA's code of conduct which specifies responsibilities for member companies, such as to improve working environments in their own organisation and supply chains or to support the rights and wellbeing of workers.

Nikon CSR* Procurement Standards

The Nikon Group recognises that socially responsible procurement activities are essential for the sustainable development of business, both for ourselves and for our procurement partners. As for our supply chain, we require our procurement partners to comply with the "Nikon CSR Procurement Standards" (https://www.nikon.com/company/corporate/procurement/pdf/csr-procurement2_e.pdf), which are based on the RBA's code of conduct, articulating the prohibition of forced and child labour, bonded (including debt bondage) or indentured labour, involuntary prison labour, and slavery or trafficking of persons, as well as the requirements on working hours and wages.

*Corporate Social Responsibility

Responsible Minerals Sourcing Policy

In response to issues related to conflict minerals, we stipulated the "Responsible Minerals Sourcing Policy". Recognising there are mineral resources that are extracted and traded in conflict-affected and high-risk areas which may become a source of human rights abuses that include child labour and forced labour, or a source of environmental destruction, conflict, and social injustice, we are collaborating with our procurement partners on surveys of conflict mineral sources and on due diligence.

Details can be found on the "Responsible Minerals Sourcing Report" page of the Nikon Corporation's website.

https://www.nikon.com/company/sustainability/society-labor/supply-chain/Responsible_Minerals_Sourcing_Report_2024_Survey.pdf

- c. Due diligence process related to modern slavery and human trafficking
- d. Risk assessment and risk management related to modern slavery and human trafficking
- e. Measurement by appropriate indicators and effectiveness of steps to endeavour to ensure that slavery and human trafficking is not taking place

Nikon

In the above Nikon Human Rights Policy, we are working to address particularly salient human rights issues related to Nikon's business activities. In FY2024, we set a target of a 90% compliance rate with the RBA Code of Conduct (at production sites) and implemented improvement activities through RBA Code of Conduct self-assessment. From FY2025, we will set a new target of a 100% implementation rate of human rights due diligence (RBA-based human rights risk survey) within our company and will implement initiatives accordingly.

[<https://www.nikon.com/company/sustainability/society-labor/supply-chain/Responsible_Minerals_Sourcing_Report_2024_Survey.pdf](https://www.nikon.com/company/sustainability/society-labor/supply-chain/Responsible_Minerals_Sourcing_Report_2024_Survey.pdf)

Based on the results of the RBA Code of Conduct self-assessment conducted in FY2022, Nikon's domestic and overseas production group companies and each Plant have formulated improvement plans for FY2023 and implemented those improvement plans in FY2024.

In addition, the Nikon Group conducts human rights and labor surveys for all group companies every year to continuously improve its response to human rights. Until now, we mainly checked whether there were migrant workers or foreign technical intern trainees who are at risk of human rights violations, but in order to ensure that we understand the risks regarding the six identified salient human rights issues, we conducted a fundamental review of the questionnaire in FY2024. From FY2025, we will redefine RBA efforts as human

rights efforts and conduct surveys based on the RBA Code of Conduct at non-production group companies in Japan and overseas. The survey includes questions to understand whether there is a company policy prohibiting forced labor and labor resulting from human trafficking, whether all workers have employment contracts in their native language or a language they can understand, and whether they understand and sign the contents of the employment conditions. If risks are found as a result of the survey, we will develop an improvement plan and carry out improvement activities.

<Reporting and consulting (whistleblowing) system>

We have internal as well as regional or local external hotline(s) by which employees are able to report if they become aware of an actual or potential violation of the Nikon Code of Conduct. It allows employees to raise concerns anonymously where the national law permits to do so. In FY2025, we plan to establish a hotline that will involve an independent third-party expert and that all stakeholders can consult with.

Supply Chain

<Building a resilient supply chain>

Nikon recognizes the establishment of a resilient supply chain as a material issue and has set a goal to achieve a 100% implementation rate of human rights due diligence for key procurement partners by FY2025.

Key procurement partners are selected based on factors such as transaction amount, criticality and substitutability of the parts, dependency, and country risk as well as environmental, social, and governance risk assessments (ESG evaluations). A CSR survey (self-assessment method) is conducted every three years for these key partners.

Furthermore, for procurement partners deemed to have high CSR procurement risks or deemed to be important, a third-party audit is conducted on annual basis to assess risks in their supply chain, including modern slavery and human trafficking, and we request and provide support for improvements.

We may review the business relationship with procurement partners who are found to have significant violations of Nikon's CSR procurement standards, who do not cooperate sufficiently toward survey or audits, or who fail to make any improvements regarding identified issues. <CSR Survey and Audit>

In FY2024, we conducted a CSR survey on 15 procurement partners. We confirmed that 14 companies had reached the target standards, and requested the remaining one company to improve on the items that were not in compliance with labor, health and safety, the environment, and ethics. We also conducted a CSR audit (second-party audit) on three companies. Among them, the top priority issues were “long working hours”, “insufficient communication of updates to laws and regulations within the company”, “lack of emergency exit signs”, “collection of fees when hiring new employees”, “existence of expired first aid kits in Department workplaces”, and “insufficient safety checks and inspections of equipment”. We requested improvements for these issues and confirmed that they have been completed.

We conducted a CSR survey with three new procurement partners, confirmed that they had met the target standards, and began doing business with them as procurement partners. We also conducted a CSR survey with seven major partners from secondary suppliers onwards, and confirmed that they had met the target standards.

Additionally, we have identified 15 additional procurement partners to focus on at M&A destinations in FY2024.

<Responsible minerals sourcing>

In light of conflict mineral issues, we endeavour to prevent human rights violations, such as modern slavery and human trafficking, through implementing our Responsible Minerals Sourcing Policy and conducting investigations of our product components on usage and supply chain of mineral resource.

As in previous years, we conducted a 3TG survey of all Business Unit products, and also expanded the scope of the cobalt survey to cover all Business Unit.

We have started making donations to the Resilience Enhancement Project conducted by the certified non-profit organization Terra Renaissance in the Democratic Republic of Congo to support the people affected by human rights abuses related to minerals from FY2023.

In FY2024, we also organized an in-house seminar by the Terra Renaissance to deepen our understanding of the conflict minerals issue.

*tin, tantalum, tungsten and gold.

f. Training and Capacity building related to modern slavery and human trafficking

We consider it important to raise awareness and increase sensitivity on human rights risks among employees in order for our company to respond to human rights issues including modern slavery and human trafficking.

Nikon

In FY2024, we continued to conduct training on human rights for all directors and employees in Nikon group companies in Japan through e-learning as in the previous period. The completion rate was 95%.

Every year on World Human Rights Day in December, the CEO's message outlining our principle on respecting human rights is communicated to employees globally via our newsletter. Theme of the message in FY2024 was "Respect for Human Rights and DEI (Diversity, Equity and Inclusion) Together with Everyone" to strengthen and ensure Nikon Group's commitment to respecting human rights. It was to advocate for establishing a work environment where the rights of all employees are respected.

In December 2024, we held a human rights event titled "Towards World Human Rights Day 2023", mainly targeting our domestic employees. The event included a series of talk sessions focusing on human rights, which lasted for approximately one month and saw the participation of numerous employees. Additionally, as part of our training program for new employees, we conducted training sessions with a focus on human rights.

Employee of our procurement departments and sections

We hold biannual Supply Chain Committee meetings, consisting of key members such as the Quality Department Manager, Procurement Department Manager, and Presidents of domestic and overseas group production companies, to discuss and review activity reports and plans for building a resilient supply chain. Under the umbrella of the Headquarters Committee, we have established the Sustainable Procurement Promotion Meeting (held monthly) and the Green Procurement Promotion Meeting (held twice a year). These meetings collaborate with procurement departments and related divisions of each business unit, as well as administrative departments of manufacturing facilities, to drive specific activities towards building a resilient supply chain.

Furthermore, we conduct annual training sessions for internal practitioners involved in procurement and new employees, deepening their understanding of the fundamentals and context of procurement operations in order to enhance supply chain stability and promote procurement activities that take environmental and social aspects into account.

Procurement partners

The Nikon Group holds information sessions every year for procurement partners to help them understand our quality control and ESG policies and concepts. We also award procurement partners who have contributed to the promotion of quality control and ESG through flexible, prompt and resilient responses.

NIKON CANADA INC.
(the “Corporation”)

RESOLUTIONS OF THE BOARD OF DIRECTORS

I. *Modern Slavery Act*

WHEREAS, the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) (the “Modern Slavery Act”) came into force on January 1, 2023 and requires, among other things, that businesses subject to the Modern Slavery Act prepare and file a report each year on, among other things, the steps that the business has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used in its supply chain;

WHEREAS, the Company has prepared its report for the financial year ended March 31, 2025, in response to the requirements under the Modern Slavery Act (the “Modern Slavery Report”), a copy of which has been provided to the Board; and

WHEREAS, the Modern Slavery Act requires that the Modern Slavery Report be approved by the Board and that an attestation be provided by a member of the Board prior to its filing with the Minister of Public Safety and Emergency Preparedness (the “Minister”).

RESOLVED THAT:

1. The Modern Slavery Report, as presented to the Board, is hereby authorized and approved by the Company, subject to such further non-material changes thereto as may be approved by any director of the Company, such approval to be conclusively evidenced by the signing of the Modern Slavery Report by such director; Any director of the Corporation is authorized and directed to sign the financial statements on behalf of the board.
2. Any director of the Company is hereby authorized, for and on behalf of the Company to sign the Modern Slavery Report and the attestation contained therein;
3. Any director or officer of the Company is hereby authorized to file the Modern Slavery Report with the Minister;
4. Any director or officer of the Company is hereby authorized and directed to submit to Public Safety Canada a completed questionnaire with respect to forced labour and child labour in the form provided by Public Safety Canada through its online portal, as such officer deems necessary or advisable, provided that the content of the responses to such questionnaire are consistent with the Modern Slavery Report to the extent applicable; and
5. Any director or officer of the Company is hereby authorized and directed, for and on behalf of the Company, to take such actions and execute all such documents or other instruments as such officer deems necessary or advisable in order to complete the matters provided for herein, the execution and delivery of such documents or other instruments and the doing of any such other act by such officer to be conclusive evidence of such determination.

II. *General*

RESOLVED THAT:

5.

These resolutions may be executed in counterparts and by means of facsimile or portable document format (PDF), each of which when so executed and delivered shall be an original, but all such counterparts shall together constitute one and the same instrument.

The foregoing resolutions are passed as evidenced by the signatures of all the directors of the Corporation pursuant to the provisions of the *Canada Business Corporations Act*.

DATED as of May 29, 2025.



Naoki Onozato



Michael N. Finch